

Attachment A

THE OFFICE OF THE ATTORNEY GENERAL OF ILLINOIS

CIVIL INVESTIGATIVE DEMAND

TO: Citizens Utility Board
c/o Robert Kelter, Director of Litigation
208 S. LaSalle St., Suite 1760
Chicago, Illinois 60604



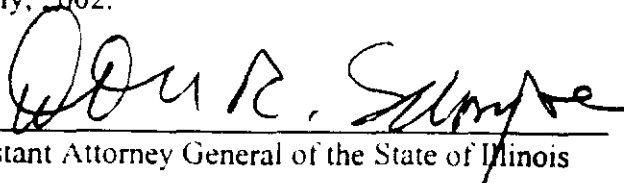
This Civil Investigative Demand is issued pursuant to the Whistleblower Reward and Protection Act, 740 ILCS §§ 175/1 et seq., in the course of a Whistleblower Reward and Protection Act investigation to determine whether there is or has been a violation of 740 ILCS § 175/1 et seq. The Whistleblower Reward and Protection Act investigation concerns allegations that NICOR presented, or caused to be presented, false claims to the State of Illinois, in connection with performance-based rate making proceedings. This Demand requires you to produce documents to the State of Illinois as set forth in the attached Schedule A.

All documents shall be produced on or before July 16, 2002, to Don R. Sampen, Assistant Illinois Attorney General, 13th Floor, 100 West Randolph Street, Chicago, Illinois 60601. Alternatively, the material may be produced at another location and by another method to be mutually agreed upon by yourself and Mr. Sampen. Please call Mr. Sampen at 312/814-6141 to make any such arrangements. The production of documentary material in response to this demand must be made under a sworn certificate in the form as provided under the Whistleblower Reward and Protection Act, 740 ILCS § 175/6(f), copy of such form being attached.

Your production of the documents and answers to the interrogatories are necessary to the conduct of the Whistleblower Reward and Protection Act investigation described above. You have the right to be assisted by counsel in complying with this Civil Investigative Demand.

Failure to comply with this Civil Investigative Demand may result in Court action against you.

WITNESS, James E. Ryan the
Attorney General of the State of Illinois,
at his offices in Chicago, Illinois, this 12th day
of July, 2002.


Assistant Attorney General of the State of Illinois

SCHEDULE A

REQUEST FOR DOCUMENTS TO ENRON CORPORATION

INSTRUCTIONS

1. Unless otherwise specified, this CID requests all responsive information in your possession, custody or control applicable to the time period between January 1, 1996 and the date of your compliance with this CID (the "relevant time period"), as well as any documents relating to such period even though created before that period.
2. Information and materials sought by these requests for documents shall include information and materials within your knowledge, possession, custody or control, or within the knowledge, possession, custody or control of any of your agents, officers, employees, attorneys, or investigators (including investigators of an attorney), or any person acting as your representative or on your behalf, including, but not limited to, any otherwise independent attorney, accountant, or consultant.
3. The following rules of construction shall apply to these requests for production and interrogatories:
 - A. The words "you" and "your" shall be considered as referring to the entity named as the recipient of this Civil Investigative Demand ("CID") and any other affiliated agency, unit, or department.
 - B. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa.
 - C. All present tenses of verbs or verb forms shall be considered to include within their meaning the future and past tense so used, and vice versa.
 - D. The words "or" or "and" are inclusive, referring to any one or more of the disjoined words or phrases, and "any" and "all" also include "each" and "every."
 - E. The masculine gender shall be deemed to include the feminine.
4. All documents are to be in their original form, and are to include all marginalia and post-its, as well as any attachments referred to or incorporated by the document. In lieu of providing the original of any document requested below, you may provide a "duplicate" of such document within the meaning of 735 ILCS 5/8-401 and 735 ILCS 5/8-402. If a document's original form was electronic, you must produce it electronically, preserving all information regarding the document

(e.g., its creation and modification dates, its location within a storage device's file structure, etc.).

5. For each document or part thereof that is not produced on the ground that it contains privileged information, please provide a privilege log wherein you identify the type of document being withheld (e.g., letter, memorandum, handwritten notes, marginalia, etc.), a description of its contents, its author(s), all actual and intended recipients of the document, its date, and the specific privilege being asserted, all with sufficient particularity so as to allow the State of Illinois, and potentially a court, to assess the validity of the claim of privilege. If only a portion of a document responsive to a request for production contains privileged information, provide the portion of the document for which you have no claim of privilege.
6. If you at any time had possession or control of a document called for under a request for production, and if such document has been lost, destroyed, or is not presently in your possession or control, you shall describe the document, the date of its loss, destruction, purge or separation from possession or control, and the circumstances surrounding its loss, destruction, purge or separation from possession or control.
7. No agreement by the Attorney General of Illinois or any representative(s) purporting to modify, limit, or otherwise vary this CID is binding on the Attorney General of Illinois unless confirmed or acknowledged in writing by a duly authorized representative thereof.

DEFINITIONS

1. "Document" is defined as all recorded material in whatever form, including, but not limited to reports, letters, memoranda, directives, notes, correspondence, contracts, agreements, leases, charts, graphs, manuals, videotapes, audiotapes, data compilations, electronic mail messages, voice mail messages, marketing materials, training materials, computer programs in source and object code, corporate minutes and material stored in any data or computer storage system. Document is also defined to require the production of documents, such as distribution lists, that identify the person (including their addresses and telephone numbers) who received the subject matter set forth in the individual specifications.
2. When any document responsive to a request is withheld from production for any reason, state the following with respect to each such document:
 1. The title of the document;
 2. The name of the author of the document and its date of preparation;

3. The subject matter of the document;
4. The name of the custodian of the original of the document and the name of the custodian of any copies of the document; and
5. The basis upon which the document is being withheld.

DOCUMENTS REQUESTED

All documents relating to any claim that NICOR submitted false or inappropriate information in connection with performance-based rate making, including but not limited to (a) all documents placed under seal by the Illinois Commerce Commission in connection with Docket No. 01-0067, and (b) all studies, analyses, cover letters, or other documentation reflecting or commenting upon such information submitted by NICOR.

SWORN CERTIFICATE - DOCUMENTARY MATERIAL
740 ILCS 175/6(f)

_____ being first duly sworn on oath, deposes and states that he/she is the person to whom the Civil Investigative Demand ("CID") is directed, or is a person having knowledge of the facts and circumstances relating to such person's production of documents in response to such CID, that he/she is authorized to act on behalf of such person, and that all of the documentary material required by the CID and in the possession, custody, or control of the person to whom the CID is directed has been produced and made available herein to the best of his/her knowledge and belief.

SIGNATURE

SUBSCRIBED and SWORN to before me this _____ day of _____, 2002.

NOTARY PUBLIC